



P.O. Box 32159
Newark, NJ 07102
Tel: 973-642-2086
Fax: 973-642-6523
info@aclu-nj.org
www.aclu-nj.org

JEANNE LOCICERO
Legal Director
jlocicero@aclu-nj.org
973-854-1715

Via ECF

June 26, 2025

Honorable André M. Espinosa, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

ORDER

Re: Student Doe #1, et al. v. Noem, et al., No. 25-cv-2998 (KSH) (AME)

Dear Judge Espinosa,

We represent Plaintiffs in the above-captioned matter and respectfully write on behalf of the Parties concerning a proposed schedule for the limited, expedited discovery allowed by the Court. *See* ECF No. 53. The Parties propose the following schedule:

- The Government will provide the Administrative Record for each Plaintiff within 21 days, on or before July 17, 2025; and
- The Government will complete production of responses to the limited, expedited discovery by August 7, 2025, and produce documents on a rolling basis.

We appreciate the Court's consideration of this schedule and are prepared to make adjustments if the Court requires.

Respectfully submitted,

/s/Jeanne LoCicero

**American Civil Liberties Union
of New Jersey Foundation**
Jeanne LoCicero
Farrin R. Anello
Molly K.C. Linhorst
570 Broad Street, 11th Floor
Newark, New Jersey 07102
(973) 854-1715
jlocicero@aclu-nj.org

**Rutgers Immigrant Community
Assistance Project (RICAP)**
Center for Law and Justice

Jason Hernandez
Jessica Rofe*
Leena Khandwala
123 Washington Street
Newark, New Jersey 07102

Gibbons P.C.
John J. Gibbons Fellowship in
Public Interest and Constitutional Law
Lawrence S. Lustberg, Esq.
Ruth O'Herron, Esq.
One Gateway Center
Newark, NJ 07102
(973) 596-4500
llustberg@gibbonslaw.com
roherron@gibbonslaw.com

Attorneys for Plaintiffs

** admitted pro hac vice*

cc: All Counsel of Record (via ECF)

The parties' proposed schedule is **SO ORDERED**. The parties shall press forward with diligence to complete limited, expedited discovery by September 5, 2025.

The Court will hold a telephonic status conference on **September 5, 2025, at 11:00 a.m.**, which the parties shall join by dialing 973-437-5535, access code 400 843 579#. Three business days prior to the conference, the parties shall file a joint status letter, not to exceed three pages.

/s/ André M. Espinosa
ANDRÉ M. ESPINOSA
United States Magistrate Judge

July 2, 2025